

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AMERICAN CIVIL LIBERTIES UNION,)	
et al.,)	
)	
Plaintiffs.)	
)	
v.)	Civil Action No.
)	98-CV-5591
ALBERTO R. GONZALES, in his official)	
capacity as Attorney General of)	
the United States.)	
)	
Defendant.)	
)	
)	

JOINT REPORT REGARDING THE DISCOVERY
AND MAINTENANCE OF ELECTRONIC INFORMATION
INCLUDING COMPUTER BASED AND DIGITAL INFORMATION

The parties, by their undersigned counsel and pursuant to paragraph 4 of Pretrial Order No. 14 (Case Management Order), hereby submit the following joint report.

The parties have continued to meet and discuss the issue of discovery and maintenance of electronic information including computer based and digital information. The sole issue identified at this time is defendant's concern with the preservation of plaintiffs' web sites. Defendant proposed to resolve this issue by utilizing commercial software such as that provided by bluesquirrel.com, an Internet software provider, and archive.org, a digital library of Internet web sites, to obtain a snapshot of plaintiffs' web sites at a specific point in time. Defendant continues to evaluate various software. The parties

propose that this matter be added to the agenda for the August 16, 2005 conference.

FOR THE PLAINTIFFS

_____/s/_____

DATE: July 15, 2005

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_____/s/ Raphael O. Gomez_____

DATE: July 15, 2005

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